



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

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FEB 19 2013

OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

Linda Coates-Markle  
Field Manager  
Bureau of Land Management  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, Washington 98801-1521

Re: Comments on the Draft EIS for Vantage to Pomona Heights Transmission Line Project (EPA Project Number: 10-002-BLM).

Dear Ms. Coates-Markle:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act, the US Environmental Protection Agency has reviewed the Bureau of Land Management Draft Environmental Impact Statement for the proposed **Vantage to Pomona Heights Transmission Line Project** in Grant, Benton, Kittitas, and Yakima Counties, Washington.

The DEIS analyzes potential environmental impacts associated with a proposal to grant a right-of-way to construct, operate, and maintain a new 230 kV transmission line and associated facilities on public lands administered by the BLM in Yakima, Kittitas, Benton, and Grant Counties in south-central Washington. The line would extend from the existing Bonneville Power Administration substation in Vantage, Grant County to Pacific Power's Pomona Heights substation in Selah, Yakima County. Other landowners in the project area include federal (Joint Base Lewis-McChord Yakima Training Center and Bureau of Reclamation), State and Counties (Yakima, Grant, Kittitas and Benton). The project will also require BPA authorization to interconnect to the Federal Columbia River Transmission System at its Vantage substation. Project activities would include access road construction and improvements, ROW vegetation clearance and earth moving during site preparation for structures and other facilities, and upgrades to Pomona Heights and Vantage substations. There would also be hillside cuts or fills where construction activities would occur in steeply sloped terrain and blasting in rocky areas.

We note with appreciation that the DEIS addresses many of the issues we raised during the project scoping period in February 2010, including analysis of cumulative and climate change effects. Overall, most impacts by the project would be due to construction activities, which would generate both temporary and permanent impacts related to the project footprint and long-term operations and maintenance. In particular, the EPA is concerned about the project's potential impacts to water quality, land use and farmlands, and other resources as discussed below.

#### **Water Quality Impacts**

The DEIS indicates that water quality may be adversely affected by project construction which is likely to carry sediment and pollutants to nearby waterbodies (p. 4-213). We note that plans include implementation of erosion and sediment controls. However, the project will cross many drainages and

the combination of riparian vegetation and other vegetation removal, earth moving activities and associated erosion and sediment loading could exacerbate water quality conditions in streams already on Washington State's list of impaired water bodies due to exceedances of water quality standards for temperature and other pollutants. For example, the Columbia River at Priest Rapids Lake and the Lower Crab Creek have been listed as water quality impaired due to temperature and pesticides. Therefore, we recommend that extra measures be taken to avoid adverse impacts in these areas. Also, please note that antidegradation provisions of the Clean Water Act apply to those waterbodies where water quality standards are currently being met.

Because of the project's potential water quality impacts, we recommend that BLM continue to coordinate with Washington State Department of Ecology and affected Tribes to assure that the state and tribal water quality standards will be met during implementation of the proposed project. The final EIS should also include information on how BLM will be working collaboratively with Ecology to ensure compliance with Water Quality Restoration Plans, if any, that will function as BLM's share of Total Maximum Daily Loads implementation, designed to meet State and Federal water quality rules and regulations in Lower Crab Creek and the Columbia River at Priest Rapids Lake.

Since the project anticipates obtaining a National Pollutant Discharge Elimination System permit for planned construction activities expected to disturb nearly 330 acres (80 acres permanently and 250 acres temporarily), the final EIS should include updated information on the permit application process and measures to protect water quality.

#### **Land Use and Farmland Impacts**

The DEIS indicates that the proposed project would impact lands that have been designated as prime farmland and lands managed under the Conservation Reserve Program (Table 4.4-3 and 4, p. 4-97 and 98). Even though some areas would be disturbed temporarily and be restored afterwards, other areas would be impacted permanently. For example, under route segment 3c, short term impacts would occur on about 94 acres (p. 4-95), while high and moderate impacts would affect up to 16 miles of land under the same route segment i.e., 3c (p. 4-96).

The Farmland Protection Policy Act<sup>1</sup> includes prime farmland, unique farmland, and land of statewide or local importance. Farmlands that are contiguous to sensitive areas, such as floodplains, wetlands, and aquifer recharge zones play important roles in buffering these areas from development and should be protected. Thus, the FPPA seeks to assure that federal actions are designed in a manner compatible with state and local policies and programs to protect farmlands. Because of potential impacts to farmlands and subsequent loss of crops and wildlife habitat, we recommend BLM coordinate with the Natural Resources Conservation Service and/or USDA Service Center and the Farm Service Agency in assessing the project impacts to farmlands, including loss of CRP lands and determining measures to be followed to avoid and minimize any significant impacts to farmlands. The final EIS should include information about NRCS analysis and rating of the potential impacts, and what will be done to restore farmlands and compensate landowners for losses incurred due to the project.

#### **Vegetation and Wildlife**

Section 4.2.3 discusses impacts to vegetation resources and indicates that the proposed project would directly affect vegetation communities through trampling and removal due to construction of the

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<sup>1</sup> <http://www.nrcs.usda.gov/programs/fppa/>

transmission line, access roads and work spaces. Some impacts would be temporary, while others would be permanent. Since thermal modification is the primary cause of streams not supporting beneficial uses in the project area, we are concerned that vegetation removal along waterways would result in streambank scouring, erosion, poor drainage and loss of soil and wildlife habitat. Therefore, we recommend that such areas be targeted for active restoration to increase vegetation cover and improve thermal conditions in stream channels.

### **Cultural Resources**

The draft EIS indicates that there are several cultural resources in the project area, which would be affected by the proposed project activities, including, but not limited to archaeological and architectural resources, as well as burials, rock features (cairns, alignments), talus pits, rock art (pictographs and petroglyphs), and rockshelters (p. ES-iv). The EIS also reports that surveys are still ongoing and that impacts to traditional cultural properties will not be known until affected Tribes have completed their assessments within the project's area of potential effects (p. 5-8).

Section 106 of the the National Historic Preservation Act requires a federal agency, upon determining that activities under its control could affect historic properties, consult with the appropriate State Historic Preservation Officer/Tribal Historic Preservation Officer. In addition, Section 106 requires that Federal agencies consider the effects of their actions on cultural resources, following regulation in 36 CFR 800. Executive Order 13007, *Indian Sacred Sites* (May 24, 1996), requires federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian Religious practitioners, and to avoid adversely affecting the physical integrity of such sacred sites. It is important to note that a sacred site may not meet the National Register criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site.

Because of anticipated cultural resources impacts by the project, the EIS should address Executive Order 13007, distinguishing it from Section 106 of the NHPA, and discuss how BLM would avoid adversely affecting the resources. The EIS should provide a summary of all coordination with Tribes and with the SHPO/THPO, including identification of NRHP eligible sites, and development of a Cultural Resource Management Plan.

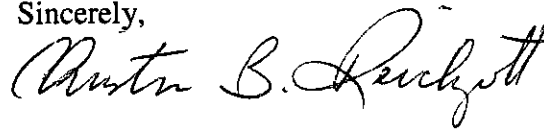
### **Transmission Line Monitoring**

The proposed project has the potential to impact resources within the proposed corridor for a long time. Therefore, we recommend that the final EIS describe a monitoring program designed to assess both impacts from the project and the effectiveness of the proposed mitigation measures for the impacts. The document should also indicate how the program would use an effective feedback mechanism to assure environmental objectives would be met throughout the project lifespan.

Based on the concerns discussed above, we are assigning a rating of EC-2 (Environmental Concerns – Insufficient information) to this DEIS. A copy of the rating system used in conducting our review is enclosed for your reference.

We appreciate the opportunity to review this DEIS. If you have question about our comments, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Theo Mbabaliye of my staff at (206) 553-6322 or electronic mail at [mbabaliye.theogene@epa.gov](mailto:mbabaliye.theogene@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" and last name "Reichgott" clearly distinguishable.

Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosure  
EPA Rating System for Draft EISs

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.